



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 21, 2018

Via ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United State Courthouse
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (ALC)

Dear Judge Carter:

We write with the consent of defense counsel in the above-referenced matter to request an adjournment of the deadline set by the Court for the Government to produce to defense counsel “the complete data set of discovery that is reasonably free of technical problems[.]” (Dkt. 53). The Court’s September 7, 2018 order required that such discovery be produced today.

Since issuance of the Court’s September 7 order, the Government’s IT staff has worked to address the numerous purported technical issues raised by the defense. While the causes and potential solutions for some of these issues have now been identified, others require further work and consultation with the defense. Yesterday, the parties conducted a conference call in order to share information and expedite the resolution of these issues. As a result of that call, the parties’ IT personnel are now communicating directly in order to further facilitate that process. Because additional time is required to address these matters, the Government respectfully requests that it be permitted to provide a further update to the Court on October 1, 2018. In the meantime, the Government will make all efforts to resolve any technical issues and complete its production in advance of that date.

Cc: Defense Counsel (via ECF)